

EXHIBIT 5

Deposition of Rachelle Howell

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

IMELDA CUYUGAN,)	
)	
Plaintiff,)	
)	
vs.)	No. 4:15-cv-00260-RCC
)	
PIMA COMMUNITY COLLEGE DISTRICT,)	
LEE LAMBERT, in his personal)	
capacity,)	
)	
Defendants.)	
_____)	

DEPOSITION OF RACHELLE HOWELL

Tucson, Arizona

July 12, 2016

RAYNBO COURT REPORTING, LTD.

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Tucson, Arizona 85741
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Reported by: Raynbo Silva, RPR, CR
Certified Reporter No. 50014

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1 confusing it is. But I have, you know, 25 years of looking
2 at higher ed. org. charts that don't make sense, so I get
3 it.

4 Q. When all this shuffling of positions and
5 brainstorming about modifying the structure was happening,
6 do you believe based on your experience involved in the
7 restructuring, right, that the decision to eliminate Imelda
8 Cuyugan was one of, okay, Imelda is not going to be with us,
9 we're eliminating her or was it we're going to eliminate the
10 department?

11 MS. STATON: Object to the form, lacks foundation,
12 asked and answered.

13 THE WITNESS: I think it was both. I think, I
14 think two, two desired end results were achieved through the
15 same action.

16 Q. But then Michael Peel was retained. So why would
17 you -- if the department was going to be eliminated, why
18 would you then retain Michael Peel? So there was some
19 choosing and picking; correct?

20 MS. STATON: Object to the form. Excuse me.
21 Lacks foundation, calls for speculation and asked and
22 answered.

23 THE WITNESS: My only conversation with Zelema
24 about that, about Michael Peel was this e-mail and then a
25 recognition of the need I think on her part that someone has

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1 to be, someone had to be the liaison with external
2 lobbyists.

3 So I mean that's, that's it, I think. I mean
4 that's all I was involved in with that.

5 So yeah, I mean I wasn't involved in any picking
6 or choosing, and I didn't have a conversation with Zelema
7 about picking and choosing.

8 Q. You were just told keep Michael Peel?

9 A. Correct.

10 Q. And we're eliminating Imelda?

11 MS. STATON: Object to the form, asked and
12 answered.

13 Q. You can answer.

14 A. That's correct.

15 (Whereupon Deposition Exhibit Number 7 was marked
16 for identification.)

17 Q. Had you ever reviewed these documents before?

18 A. Yeah. I'm sure I did. I remember this was
19 regular placement.

20 Q. Uh-huh.

21 A. I don't remember this, but this is just a summary
22 of -- this is probably what the HR analyst wrote up. Or did
23 I write this up? I don't remember.

24 Q. Were you involved in the selection process for the
25 position of associate director for media, community and

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1 community and government relations?

2 A. Right.

3 Q. Correct?

4 A. Correct.

5 Q. But then Lee Lambert decided to bring it again and
6 be part of -- the position in house at a level of executive
7 director had -- there was a necessity for a position like
8 that; correct?

9 A. Correct.

10 MS. STATON: Object to the form, lacks foundation.

11 A. Yeah. I mean my understanding is from Lee's
12 perspective that he did see that necessity. I mean I viewed
13 this as my public information person, public information
14 position, yeah.

15 Q. So would it be correct for me to understand it as
16 being almost like bringing back the position that Imelda
17 Cuyugan had?

18 MS. STATON: Object to the form, misstates the
19 evidence, lacks foundation.

20 THE WITNESS: Yeah. I mean it's a similar, a very
21 similar position.

22 I think we already had our external lobbyist at
23 that point, also. We did that in the fall, I think, of
24 2014.

25 Q. And who was that?

EXHIBIT 6
Pima Community College Salary Look up information
for Elizabeth Howell and Michael Peel

Salary Lookup

Find the base salaries and wages of regular, full-time PCC employees using the fields below. This salary listing represents a point-in-time and new data will be provided annually. Additional information on [classification and compensation](#) can be found on the Human Resources website.

To search: Use a wildcard (*) if you are not sure of the exact, full name of an individual, unit, etc. Enter * in the Last Name field to display all employees. Data can be sorted by clicking the column header.

Show 10 entries

Name	Job title	Campus / Unit	Salary	Hourly	Year
Peel, Michael T	Govt Relations Adv Analyst	External Relations	\$56,308		2016-17

Showing 1 to 1 of 1 entries

Salary Lookup

Find the base salaries and wages of regular, full-time PCC employees using the fields below. This salary listing represents a point-in-time and new data will be provided annually. Additional information on [classification and compensation](#) can be found on the Human Resources website.

To search: Use a wildcard (*) if you are not sure of the exact, full name of an individual, unit, etc. Enter * in the Last Name field to display all employees. Data can be sorted by clicking the column header.

Show 10 entries

Name	Job title	Campus / Unit	Salary	Hourly	Year
Howell, Elizabeth V	Administrator	External Relations	\$108,085		2016-17
Howell, Jacqueline M	Support Technician	Northwest Campus		\$18.74	2016-17

Showing 1 to 2 of 2 entries